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PLAINTIFF'S STATEMENT OF UNDISPUTED FACTS

MAR 23 2020

U.S. DISTRICT COURT
MIDDLE DISTRICT OF TN.

1. On October 2, 2016, CoreCivic employees, Officer Christopher Martinez (Martinez) and Officer Joseph Froio entered my housing area to transport me using racially charged verbally abusive language. A physical altercation ensued.

Response:

2. After the physical altercation, Officer Martinez and Officer Froio commanded me to be lay on the floor to which I complied and they shackled my hands behind my back.

Response:

3. They then proceeded to mace me continuously.

Response:

4. I was already lying flat on the floor, but the aforementioned officers still used excessive force by continuously spraying my face with mace.

Response:

5. Moments later Officer Doreen Trafton (Trafton), Officer Brandon Bowers (Bowers), Lieutenant Michael Ward (Ward) arrived to aid in transporting me. Bowers immediately slammed my head into a brick wall.

Response:

6. While transporting me to a secluded area, Trafton spewed profanity and urged the other Officers to give me payback for the earlier physical altercation

Response:

7. After she incited the physical violence, Ward and Bowers took me to secluded area and punched my body multiple times with closed fists. They slammed my head to the wall.

They pulled my hair. They kicked me countless of time as well. The entire time I was on the ground compliant with my hands shackled behind my back.

Response:

8. Captain Inman and other unknown officers joined in the beating as well.

Response:

9. The officers involved in the beating used excessive force.

Response:

10. As a result of the unnecessary physical force, I sustained multiple bruises and contusions to my face and body which continuously affect me to the present day.

Response:

11. There was not a nurse present when they took me to the secluded area.

Response:

12. Due to my bad injuries the nurse could not treat me when she arrived after the severe beating.

Response:

13. However, due to my severe injuries, she sent me to Wayne County Hospital, an independent medical facility.

Response:

14. I made multiple of grievances against all known officers, Corecivic, and all named Defendants.

Response:

15. Once transferred RMSI, I made more grievances that were sent to SCCF but personnel refused to respond to the grievances.

Response:

16. Trafton incited the physical violence by encouraging the other officer to beat me.

Response

17. I can testify to witnessing guards using excessive force on other inmates as well.

Response:

18. In my case, I was abused to the point that I had to be sent out to an outside medical facility.

Response:

19. CoreCivic also has a customary practice of not investigating citizen's complaints.

Response:

20. SCCF tried numerous of times to thwart my attempts to file grievances. Officials used many different excuses including alleging that my handwriting was illegible in attempt to cover their actions.

Response:

21. Once transferred to another institution, I was able to work with different officials that sent my grievances to SCCF, but SCCF failed to respond.

Response:

22. I filed proper and appropriate grievances all the way through the TDOC Commissioner's Office; thus, properly exhausting my administrative remedies.

Response:

23. I was left bloody with multiple physical abrasions and bruises to my body and face. I have permanent scars on my face from their use of excessive force.

Response:

24. Due to the seriousness of my injuries, I was rushed to Wayne County Hospital to receive outside medical attention. I requested my medical records and was told they were sent to court. I was denied access to them. See attached TDOC Inmate Inquiry: Medical Dept.

Nurse Voss.

Response:



Gregory Douglas